

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

RONALD BARROWS, Individually and	:	
on behalf of other similarly situated	:	
individual Chattanooga City Firefighters,	:	
	:	
Plaintiff,	:	NO. 1:10-CV-280
	:	
vs.	:	MATTICE/CARTER
	:	
CITY OF CHATTANOOGA,	:	
	:	
Defendant.	:	

**FINAL RULE 26(A)(3) DISCLOSURES OF
DEFENDANT, CITY OF CHATTANOOGA**

Comes now the Defendant, City of Chattanooga, by and through counsel, and pursuant to Rule 26(a)(3) of the *Federal Rules of Civil Procedure* files their initial disclosures as follows:

(A) Names and addresses of witnesses to be called:

Will Call:

1. Fire Chief Randy Parker, 910 Wisdom Street, Chattanooga, TN 37406;
2. Susan Dubose, City Deputy Administrator Personnel, City Hall, 1001 11th Street, Chattanooga, TN 37402;
3. Jean Smith, City Compensation Management Analyst, City Hall, 1001 11th Street, Chattanooga, TN 37402;

May Call:

4. Assistant Fire Chief Lamar Flint, 910 Wisdom Street, Chattanooga, TN 37406;
5. Brian Smart, Manager Financial Operations, 3410 Amnicola Highway, Chattanooga, TN 37406;
6. Donna Kelley, City Personnel Director, City Hall, 1001 11th Street, Chattanooga, TN 37402;

7. Any necessary rebuttal witnesses; and
8. Any witnesses listed by any other party.

(B) A designation of those witnesses whose testimony is expected to be presented by deposition:

None.

(C) An appropriate identification of each document or other exhibit separately identifying those the party expects to offer and those which the party may offer if the need arises:

Expect to Offer:

1. City's discovery responses to Plaintiff's Interrogatories and Request for Production of Documents dated January 21, 2011;
2. Discovery responses from Plaintiff to City's Interrogatories and Request for Production of Documents dated March 28, 2012;
3. City's Personnel File of Plaintiff;
4. David M. Griffeth & Associates Job Classification of Chattanooga Fire Department Fire Captains;
5. The Segal Company's Total Compensation Study Recommendations (Final Report) prepared by the Segal Company and dated October 30, 2007;
6. Job Analysis Questionnaire completed by Plaintiff;
7. Chattanooga City Code Section 2-155 (before July 20, 2010);
8. Ordinance No. 21414 passed by the Chattanooga City Council on July 20, 2010;
9. Resolution No. 26366 adopted by the Chattanooga City Council on July 20, 2010;
10. Deposition transcript of Plaintiff dated June 15, 2012;
11. Segal's Job Classification of fire captain;

May Offer:

12. Chattanooga Fire Department Training File for Ronald Barrows;
13. Personal Leave Report of Plaintiff from June 6, 2008 to March 8, 2012;

14. Plaintiff's W-2 Wage and Tax Statements for 2009 and 2010;
15. Plaintiff's timesheets for 2008, 2009, 2010 and 2011;
16. Chattanooga Council Minutes of July 6, 2010 and July 20, 2010;
17. Oracle Salary Print-Out of Plaintiff;
18. Any necessary rebuttal exhibits;
19. Any exhibits listed by any other party;

Respectfully submitted,

CITY OF CHATTANOOGA, TENNESSEE
MICHAEL A. MCMAHAN, CITY ATTORNEY

By: s/ Valerie L. Malueg
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing document has been served upon the below-listed individuals by hand delivery or by placing the same in the United States mail on the date below written, with sufficient postage affixed thereto to reach its destination.

Wilson C. von Kessler, II, Esq.
Christopher D. Markel, Esq.
Adam S. Major, Esq.
735 Broad Street, Suite 402
Chattanooga, TN 37402

This 8th day of August, 2012.

s/ Valerie L. Malueg